

# **EXHIBIT C**

To Defendants Shell Oil Company and Shell Oil Products  
US, Inc.'s Joinder in Defendant United States Steel's  
Motion to Exclude Plaintiff's Expert Robert Herrick

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

— — —

JAMES COPPAGE :  
Plaintiff, : Civil Action  
vs. : No.  
: 1-18-cv-03823-  
UNITED STATES STEEL : GLR  
CORPORATION, et al., :  
: Defendants :

March 11, 2019

— — —

Videotaped Deposition of JAMES  
COPPAGE, taken pursuant to Notice at the  
Sheraton-Baltimore North Hotel, 903 Dulaney  
Valley Road, Towson, Maryland 21204,  
beginning at 9:05 a.m. before Brigitte A.  
Strain, a Federally Approved Registered  
Professional Reporter and Notary Public in  
and for the State of Maryland.

— — —

VERITEXT LEGAL SOLUTIONS

## MID-ATLANTIC REGION

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<p>1        I N D E X</p> <p>2        - - -</p> <p>3        Testimony of: JAMES COPPAGE</p> <p>4        By Mr. DuPont.....10, 282</p> <p>5        By Mr. Cairone.....105</p> <p>6        By Mr. LeClere.....179</p> <p>7        By Mr. Weiss.....190, 299</p> <p>8        By Mr. Schuman.....215</p> <p>9        By Mr. Richmond.....257</p> <p>10       By Ms. Prosser.....251, 297</p> <p>11       By Ms. Magliacco.....276</p> <p>12       By Mr. Peles.....279</p> <p>13       - - -</p> <p>14       - - -</p> <p>15       E X H I B I T S</p> <p>16       - - -</p> <p>17       EXHIBIT NUMBER    DESCRIPTION    PAGE MARKED</p> <p>18       Coppage 1    The MDS Guide</p> <p>19              Coppage 566-602    102</p> <p>20       Coppage 2    Handwritten Note by</p> <p>21              Mr. Coppage of</p> <p>22              Medical Treatment    122</p> <p>23       Coppage 3    Handwritten Sticky</p> <p>24              Note - MDS/MPN    161</p> <p>25       Coppage 4    Progress Notes, Johns</p> <p>26              Hopkins</p> <p>27              Coppage 32-37    172</p> <p>28       Coppage 5    Social Security Statement</p> <p>29              Coppage 603-608    255</p>		<p>1        VIDEO TECHNICIAN: Good</p> <p>2        morning. We are going on the record</p> <p>3        at 9:05 a.m. on March 11, 2019.</p> <p>4        This is media unit one of the</p> <p>5        video recorded deposition of James</p> <p>6        Coppage, taken by counsel for the</p> <p>7        Plaintiff in the matter of James</p> <p>8        Coppage versus United States Steel</p> <p>9        Corporation, et al., filed in the</p> <p>10       United States District Court for the</p> <p>11       District of Maryland. Case Number</p> <p>12       1:18-cv-03823-GLR.</p> <p>13       This deposition is being held</p> <p>14       at Sheraton Baltimore North Hotel,</p> <p>15       located at 903 Dulaney Valley Road,</p> <p>16       Towson, Maryland 21204.</p> <p>17       My name is Curtis Rosinski,</p> <p>18       and I'm the videographer. The court</p> <p>19       reporter is Brigitte Strain.</p> <p>20       Would counsel please identify</p> <p>21       yourselves and state whom you</p> <p>22       represent.</p> <p>23       MR. DUPONT: Andrew DuPont for</p> <p>24       Mr. Coppage.</p>
<p>1        DEPOSITION SUPPORT INDEX</p> <p>2        INSTRUCTION NOT TO ANSWER:</p> <p>3        Page Line</p> <p>4        None</p> <p>5        REQUEST FOR PRODUCTION OF DOCUMENTS:</p> <p>6        Page Line    Description</p> <p>7        None</p> <p>8        STIPULATIONS:</p> <p>9        Page</p> <p>10       284</p> <p>11       QUESTIONS MARKED:</p> <p>12       Page Line</p> <p>13       None</p> <p>14      </p> <p>15      </p> <p>16      </p> <p>17      </p> <p>18      </p> <p>19      </p> <p>20      </p> <p>21      </p> <p>22      </p> <p>23      </p> <p>24      </p>	Page 7	Page 9

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<p>1 days.</p> <p>2 Q. How about as a journeyman 3 pressman at the Wall Street Journal and 4 Baltimore Sun, in that period of '98 until 5 2006, when you retired, how many days a week 6 were you working?</p> <p>7 A. Average five, but I could get 8 six sometimes. You know, not too often.</p> <p>9 Q. Before you started working at 10 the press shops in 1960 -- Excuse me.</p> <p>11 MR. DUPONT: Strike that.</p> <p>12 BY MR. DUPONT:</p> <p>13 Q. Before you started working at 14 the Baltimore Sun in 1960, had you had jobs 15 before that?</p> <p>16 A. Yes.</p> <p>17 Q. And what type of work did you 18 do before that?</p> <p>19 A. Worked for two plumbing 20 outfits. Worked three gas stations.</p> <p>21 Q. How much time did you spend at 22 the gas stations?</p> <p>23 A. 40 hour week.</p> <p>24 Q. For how long a period of time?</p>	<p>Page 82</p> <p>1 A. Now I know that.</p> <p>2 Q. What do you understand it to 3 be? I know it's a big word, so do your best 4 with it.</p> <p>5 A. Myelodysplastic syndrome. I 6 had a doctor write it down.</p> <p>7 Q. You can hold on to that for 8 now.</p> <p>9 A. Oh, I thought they'd want the 10 spelling.</p> <p>11 Q. What happened with your health 12 in 2012?</p> <p>13 A. 2012, I went to my primary 14 care physician for a regular checkup. And 15 we did blood work. And my white cell count 16 was at 19,000. So he sent me to a Dr. 17 Schraeder at St. Joseph's Hospital. And we 18 talked about the situation, you know. And 19 at the time he told me that the only thing 20 we do right now -- and we only discussed 21 white cells. We didn't discuss any other 22 cells. He says, we just monitor it. We 23 don't do anything till you get over 50. 24 50,000.</p>
<p>1 A. Not too long. About 17 -- Oh, 2 wow. Between -- between the four that I 3 just said, the four -- less than two years.</p> <p>4 Q. Were there three gas stations 5 or four?</p> <p>6 A. Three.</p> <p>7 Q. Okay. So --</p> <p>8 A. One, two, three.</p> <p>9 Q. So combined time, less than 10 two years between those gas stations, 11 whether it was three or four?</p> <p>12 A. And the two plumbers.</p> <p>13 Q. Okay. So the two years -- 14 during those two years you spent working at 15 the two plumbers and three or four gas 16 stations?</p> <p>17 A. Right.</p> <p>18 Q. So I want to change gears with 19 you and I want to talk to you about your 20 health. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. Do you have a form of cancer?</p> <p>23 A. Yes.</p> <p>24 Q. All right. What do you --</p>	<p>Page 83</p> <p>1 Q. 50,000 what?</p> <p>2 A. Cells, I guess.</p> <p>3 Q. White blood cells?</p> <p>4 A. Oh, white blood cells, yes.</p> <p>5 Q. All right. So this is in 6 2012?</p> <p>7 A. 2012.</p> <p>8 Q. So we're going to pick up with 9 that in a minute, but I want to talk to you 10 about your health before 2012.</p> <p>11 Did you have some -- How were 12 you feeling before you learned about these 13 white blood cells being elevated in 2012?</p> <p>14 A. Fine.</p> <p>15 Q. And how was it that you 16 learned about the white blood cells being 17 high?</p> <p>18 A. Through a blood test for --</p> <p>19 What do you call it? Just for a regular 20 checkup.</p> <p>21 Q. Now, before you had this blood 22 test and you were found to have around 23 19,000 white blood cells, did you -- you 24 said you were feeling fine?</p>

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<p>1       A. No. The doctor just said he's 2 worn out.</p> <p>3       Q. Now, when your parents smoked 4 growing up, and I know this was a long time 5 ago, this was a different time, but would 6 they have smoked in your house?</p> <p>7       A. No. Oh, yes.</p> <p>8       Q. In the car, if they were 9 driving you around?</p> <p>10      A. Yes.</p> <p>11      Q. Okay. Pretty much wherever. 12 Right?</p> <p>13      A. Yes.</p> <p>14      Q. Okay. Sir, did you do it -- 15 other than speaking with your attorney -- 16 and I don't want to know about any 17 discussions with your attorneys, but did you 18 do anything else to prepare for your 19 deposition here today?</p> <p>20      A. Just made my little list up 21 for a timeline.</p> <p>22      Q. Okay. And those are the notes 23 that we already talked about; correct?</p> <p>24      A. Yes.</p>	<p>Page 278</p> <p>1 page, and towards the bottom of the page, 2 there's listed a Shell gas station.</p> <p>3       A. Yes.</p> <p>4       Q. Do you recall working at this 5 -- or at the Don &amp; Jess Shell Station in 6 1960?</p> <p>7       A. Yes.</p> <p>8       Q. And what did you do when you 9 worked at this station?</p> <p>10      A. Pumped gas, grease cars, fix 11 flats.</p> <p>12      Q. And --</p> <p>13      A. I wasn't a mechanic.</p> <p>14      Q. How frequently did you work at 15 this gas station?</p> <p>16      A. Five days a week.</p> <p>17      Q. Five days a week. And do you 18 recall what your rate of pay was during that 19 period?</p> <p>20      A. Minimal. Probably minimum 21 wage.</p> <p>22      Q. Okay. And did you work for 23 the entire year?</p> <p>24      A. 1960? No.</p>
<p>1       Q. So did you review any other 2 documents?</p> <p>3       A. No, other than -- the real 4 timeline was when I got this. That's when I 5 -- that's where I could start making my 6 timeline.</p> <p>7       Q. And you're referring to that 8 that -- the Walgreens pamphlet; is that 9 correct?</p> <p>10      A. Yes.</p> <p>11      Q. Okay. Those are all the 12 questions I have, sir.</p> <p>13      - - -</p> <p>14 BY MR. PELES:</p> <p>15      Q. Good afternoon, Mr. Coppage.</p> <p>16 My name is --</p> <p>17      A. Good afternoon.</p> <p>18      Q. -- Josh Peles. I represent 19 Shell Oil Company, Shell Oil Products US. I 20 just have a few questions for you.</p> <p>21      On your Social Security 22 Statement, and that's this --</p> <p>23      A. Oh, this here.</p> <p>24      Q. -- one over here, on the first</p>	<p>Page 279</p> <p>Page 281</p> <p>1       Q. And do you recall the months 2 in which you worked at this Shell gas 3 station?</p> <p>4       A. Warm weather, maybe summer 5 time.</p> <p>6       Q. Okay. That's all I have.</p> <p>7       Thank you.</p> <p>8       A. Okay. Thank you.</p> <p>9       MS. PROSSER: I forgot. May I?</p> <p>10      MR. DUPONT: Have all the 11 other defendants gone yet?</p> <p>12      MS. PROSSER: Oh, I'm sorry.</p> <p>13      Anybody -- anybody has --</p> <p>14      MR. DUPONT: Any other defense 15 counsel, anybody on the phone?</p> <p>16      Anybody have questions?</p> <p>17      (No response.)</p> <p>18      MR. DUPONT: Okay. I have some 19 questions.</p> <p>20      MS. PROSSER: Can I just do a 21 couple follow-ups?</p> <p>22      MR. DUPONT: I'm going to go.</p> <p>23      MS. PROSSER: Okay. All 24 right.</p>